 Edd Kray
02/03/98 06 32 AM

To Fred Gerdeman/amppi/rffo@RFFO
cc
Subject Re DPP comment resolution


Fred,

I can't disagree with Tim on this one Use of the word "final" will be OK

Although RFCA does not give the LRA "review and approval" authority on RLCRs, it is important that we agree with the classification of buildings into class 1, 2 or 3 categories and therefore have an agreed upon procedure for preparing RLCR's

If we don't agree that a RLCR is satisfactory and have to issue a stop work order under RFCA it will really slow work down and none of us wants that


----- Forwarded by Edd Kray/SiteReps/rffo on 02/03/98 06 15 AM -----

 Fred Gerdeman
02/02/98 11 28 AM

To Edd Kray/SiteReps/rffo@RFFO, Mark Aguilar@epamail EPA gov, Ann Sieben@RFFO
cc David Nickless/AMPA/DMTP/rffo@RFFO
Subject Re DPP comment resolution

I agree with what Tim's saying, so if everyone agrees, I'll take out "an approved" and insert "a final" If you want other language, please contact me by Wednesday COB Thanks

----- Forwarded by Fred Gerdeman/amppi/rffo on 02/02/98 11 22 AM -----

 Tim Howell
01/30/98 07 42 AM

To Fred Gerdeman/amppi/rffo@RFFO
cc John Whiting@Rffo, Ann Sieben@Rffo, Patrick Ervin@Rffo, Theresa Nash/Ampipi/Rffo@Rffo, John Chapin@Rffo, John Rampe/Ampipi/Rffo@Rffo, David Nickless/Ampa/Dmtp/Rffo@Rffo, Gary Schuetz/Ammsd/Dmtp/Rffo@Rffo
Subject Re DPP comment resolution 

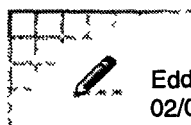
Fred But for the comment below, your attachement looks okay to me

Bullet 7 says "Decommissioning of buildings classified as Type 1 (uncontaminated) based on an approved reconnaissance level characterization report" (underlined emphases added)

But, bullet 5 says characterization reports are "concured" on not approved This appears to be an internal incongruency between bullet 5 and bullet 7, such that text in bullet 7 needs changed

Tim

AR-99-000036
ADMIN RECCRD 1/58
SW-SW-A-003200



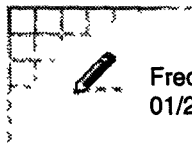
Edd Kray
02/03/98 06 42 AM

To Fred Gerdeman/amppi/rffo@RFFO
cc
Subject Re DPP comment resolution

Fred,

Your language in this memo is consistent with my understanding of our agreements from last weeks meeting

We need to put it together into the DPP and then look at how it folds together in context



Fred Gerdeman
01/29/98 06 27 PM

To Edd Kray/SiteReps/rffo@RFFO, John Whiting@RFFO, Ann Sieben@RFFO, Patrick Ervin@RFFO,
Mark Aguilar@epamail.epa.gov, Theresa Nash/amppi/rffo@RFFO, John Chapin@RFFO
cc John Rampe/amppi/rffo@RFFO, Tim Howell/OCC/rffo@RFFO, VHolm@AOL.COM, David
Nickless/AMPA/DMTP/rffo@RFFO, Gary Schuetz/AMMSD/DMTP/rffo@RFFO
Subject DPP comment resolution

Please take a look at the attached summary of today's meeting and get your comments back to me by COB Tuesday, 2/3. I'd appreciate a representative of each group (CDPHE, EPA, K-H team) responding back, so I have a record that we've reached agreement on the issues that were remanded to us by the RFCA coordinators and John Rampe.

Also, would someone from the subgroup working on the IM/IRA contents please give me an update on your progress by Monday COB? I'd especially be interested in knowing if you'll be completely finished by Wednesday COB, so I can finish the changes to the DPP by Thursday morning and redistribute it by COB.

Thanks to everyone for your continuing work on this



DPP comment res 1-29-98 c

DPP COMMENT RESOLUTION
WORKING GROUP –
Revised 1/29/98

The following “bullet numbers” relate to John Rampe’s 12/10/97 fax in response to the 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe. This is the status of the issues on the DPP after our discussion at the meeting on 1/29/98. Bolded words were added after the 1/16/98 and underlined changes resulted from the 1/29/98 meeting. These changes and input received on bullet 8 on or about 2/2/98 will be incorporated into the DPP for the comment resolution subcommittees final review.

Bullet 1. Restructure the D&D process until the track record supports the development of general procedures/RSOPs and appropriate level of detail for documents required for regulator approval. From Page 1 of 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe.

1. Previously agreed
 - the level of detail for project approval has been arrived at in the B/123 PAM and the B/779 DOP
 - for significant additional information developed and submitted after initial approval of the decision document, the level of detail should be similar to that in the aforementioned documents, and the consultative process will be used for review and approval of the additional information
2. Gerdeman will add the following statement to DPP sections 3 4 6 and 3 4 7 and revise Fig 3 4 1, “Regulatory Process Flow for Building Decommissioning” to show the readiness evaluation step after the “Regulatory Approval” step (bolded language was added as agreed on 1/16)

Section 3 4 6 and 3 4 6 (Add new, last paragraph) *The LRA will be notified of the schedule for the readiness evaluation including but not limited to management reviews and environmental readiness evaluations and of the time and location of the initial meeting of the evaluation team designated for each decommissioning project. The LRA may designate ~~an observer~~ a participant¹ for regulatory oversight and to accompany the team and attend its meetings. It is anticipated that the ~~observer~~ participant will be the LRA project lead. A copy of the readiness evaluation team’s final report will be made available to the LRA upon request of its designated ~~observer~~ participant.*

¹ Use of the term “participant” vs “observer” is an open issue as of 1/28/98

- 3 Decision on notifying regulators of new, relevant procedures was that it does not need to be in the DPP Pat Ervin will finish researching an efficient method to this and will work with CDPHE off-line 1/29/98 update Pat Ervin will complete his research per item 3 and will work with the regulators to get them copies, as needed It was confirmed that this is acceptable, and that DPP approval can be decoupled from this item
- 4 Status After the language in item 2 is incorporated into the draft, this concern will be closed This agreement was confirmed at the 1/29/98 meeting

Bullet 2. When are RFCA decisions required for decommissioning? (What's regulated under RFCA?)

- 1 Partially resolved by
 - involvement of regulators in Integrated Site Baseline and budget discussions, so they know what is scheduled and can assess prioritization, funding and other issues
 - regular (biweekly for now) meetings where regulators and DOE will be informed **early** by K-H of any likely changes related to D&D prioritization and schedules
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IM/IRA process When a RFCA decision document is required, it will be prepared and approval received before activities are undertaken that

- 1) *pose a threat of release of hazardous substances to the environment, and*
- 2) *relate to the building proper (that is, fixed equipment and structural components as opposed to moveable equipment, containerized chemicals, solutions in tanks, etc) and excluding follow-on environmental remediation activities, and*
- 3) *are not otherwise regulated, such as RCRA closure, asbestos and polychlorinated biphenyl removal, underground storage tank closures, etc*

Some activities that do not meet all these criteria may be included for information in some decision documents

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Bullet 3. Hazards, threat of release and planning for mothballing buildings

- 1 Partial resolution
 - See item 1 under bullet 2

- 2 Pat Ervin revised the language as discussed in the 1/16 meeting, and Gerdeman will incorporate it into the draft DPP at 3 4 4

Add to sec 3 4 4, on RLCR

The RLCR will be submitted to the LRA prior to "mothballing" ~~or~~ prior to beginning decommissioning. In addition, ~~should~~ whenever DOE chooses to "mothball" a facility for a period ~~(including prior to completion of decommissioning)~~, DOE will submit a hazards analysis of the facility specific conditions for the mothballed period, meet with the LRA to discuss any potential hazards or releases to the environment which might occur during the mothball period, devise actions to mitigate potential releases in collaboration with the LRA and propose adequate monitoring methods to monitor any release. Any modification to work previously approved in a decision document would be processed in accordance with RFCA, Part 10 Changes to Work

Mothball - placing a building in a condition where it is no longer ~~requires~~ actively occupied ~~occupancy~~. Ventilation, heating and air conditioning, and fire detection and protection systems may ~~would~~ be turned off. Sump pumps to remove groundwater infiltration may be operating

- 3 Status When the language in item 2 is incorporated into the draft, this concern will be closed. Confirmed 1/29/98

Bullet 4. Building decommissioning regulatory process (issue is from the first paragraph of Attachment 1, page 3 of the 12/4/97 letter from Tarlton and Rehder to Slaten and Rampe)

- 1 Status Resolution is the same as for bullet 3. After the language in item 2 in bullet 3 is incorporated into the draft, this concern will be closed. Confirmed 1/29/98

Bullet 5. Following submittal of the Reconnaissance Level Characterization Report to regulators, do they "approve" or "concur" with RFFO's decision on the building Type

- 1 Transmit the RMRS characterization protocol (still draft as of 1/15/98) to CDPHE and EPA for review (Previous agreement: Regulators said that if the protocol is acceptable, they'll agree to "concurrence" vs "approval" for the decision on what the "Type" classification of a building)

- RFETS would require the characterization protocol be followed for characterizing all deactivation and decommissioning projects including any where "mothballing" is the objective
- Revisions to the protocol will be transmitted to the regulators per item 3 under Bullet 1

- 2 Status Pat Ervin will transmit a copy of the characterization protocol to CDPHE and EPA for their review, and after comments are received from the regulators are dispositioned will initiate and complete the process needed to

1/29/98
No 'R50P
disposition
no 'approval'

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require use of the protocol for all decommissioning projects by all RFETS contractors and subcontractors 1/29/98 update After an explanation from K-H about the reasons for the delays in transmitting the protocol for their review and comments, EPA and CDPHE agreed that this issue can be closed before the regulators receive the protocol The commitment to transmit a copy of the protocol to them as soon as it is available was reaffirmed

Bullet 6 "No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary "

1 Status

- For asbestos, there was agreement that Gerdeman would make the change shown below and find an appropriate place in the DPP to insert the following, *"No further regulatory involvement for Type 1 buildings will be required provided ~~an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary~~ the site follows the requirements of the RFETS asbestos management program "*
- For PCBs, Mark Aguilar said he checked RFCA and with Dan Bench, EPA Region VIII TSCA coordinator, on the regulatory issues of whether to manage PCB cleanups under TSCA or a RFCA decision document EPA's decision is that the cleanup of PCBs that are not contaminated with radioactive materials may be managed under TSCA and do not need a RFCA decision document This met with the full agreement of the subcommittee, so this issue will be closed after the DPP is modified to include the language in item and the following, *"For Type 1 facilities containing PCBs that are not contaminated with radioactive materials, no further regulatory involvement will be required provided the site follows the requirements of the RFETS PCB management procedures "*

Bullet 7. Administrative and regulatory actions needed if contamination is found in a Type 1 building

- 1 Proposed wording by Ervin and Kray was further revised during the 1/16 meeting will be incorporated into the DPP by Gerdeman

3 4 5 Type 1 Building Decommissioning

Decommissioning of buildings classified as Type 1 (uncontaminated) based on an approved reconnaissance level characterization report will not require RFCA decision documents in addition to the DPP and will proceed based on ~~standard~~ plant operating procedures

However, if contamination is discovered during decommissioning of a building classified as Type 1, decommissioning activities in the affected areas will cease until the LRA is notified and the need to reclassify the facility is considered collaboratively

*Discovery of ~~minor spots~~ (2) of contamination after the determination that the building is Type 1 will not necessarily result in the need to reclassify a building into the Type 2 classification. If ~~minor~~ contamination can be removed by methods in which there is no threat of release of a hazardous substance to the environment, for example by simply cutting out a ~~section of a panel holding a spot~~ (2) of fixed ~~contaminant~~, **contamination**, the building may remain as Type 1. Contamination will be cleaned up and disposed properly using existing radiological or hazardous waste management procedures.*

Reclassification as a Type 2 building must be considered in any instance where removal techniques involve a threat of release of a hazardous substance (as determined by the consultative process) to the environment.

- 2 Status After the language (as revised on 1/29/98) in item 1 is incorporated into the draft, this concern will be closed

Note It was agreed by representatives of all parties that the intent of the second paragraph is to stop work in the immediate area (including a reasonable buffer area) of suspected contamination by a hazardous substance to ensure that D&D or other activities will not disturb the contaminated area and cause or exacerbate a threat of release. RFETS would be allowed to access an area of suspected contamination to collect samples or do other characterization including determination of areal extent for areas that are suspected of being contaminated with hazardous substances (including materials containing regulated radioactive contamination) without having to notify the LRA. As soon as the contamination is confirmed, the LRA will be notified.

Bullet 8. DOP and IM/IRA contents

- 1 Several changes were agreed to in the proposed DOP and IM/IRA table of contents and the comparison chart prepared by K-H
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Note There was considerable discussion about this issue at the 1/29/98 meeting. It was agreed by representatives of all parties that the issue with regard to approval of the DPP will be resolved when the language received from the group is incorporated into the DPP. The representatives also agreed that early and consistent involvement of the regulators in the scoping and planning process for each project will significantly help the projects reach successful conclusion and prevent delays caused by preparation of documents unacceptable to the regulators. The

representatives discussed the possibility of jointly developing (but not putting into the DPP) guidance for conducting initial scoping meetings, and that the guidance should include the necessity of agreeing on a project-by-project basis the level of detail to go into the decision documents. The resolution of this issue also relates to the closure of the issue in Bullet 1



Fred Gerdeman
01/29/98 06 27 PM

To Edd Kray/SiteReps/rffo@RFFO, John Whiting@RFFO, Ann Sieben@RFFO, Patrick Ervin@RFFO,
Mark Aguilar@epamail.epa.gov, Theresa Nash/amppi/rffo@RFFO, John Chapin@RFFO
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Subject DPP comment resolution

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DPP comment res 1-29-98 c

DPP COMMENT RESOLUTION
WORKING GROUP –
Revised 1/29/98

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Decommissioning of buildings classified as Type 1 (uncontaminated) based on an approved reconnaissance level characterization report will not require RFCA decision documents in addition to the DPP and will proceed based on standard plant operating procedures
However, if contamination is discovered during decommissioning of a building classified as Type 1, decommissioning activities in the affected areas will cease until the LRA is notified and the need to reclassify the facility is considered collaboratively

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Reclassification as a Type 2 building must be considered in any instance where removal techniques involve a threat of release of a hazardous substance (as determined by the consultative process) to the environment.

- 22 Status After the language (as revised on 1/29/98) in item 1 is incorporated into the draft, this concern will be closed

Note It was agreed by representatives of all parties that the intent of the second paragraph is to stop work in the immediate area (including a reasonable buffer area) of suspected contamination by a hazardous substance to ensure that D&D or other activities will not disturb the contaminated area and cause or exacerbate a threat of release. RFETS would be allowed to access an area of suspected contamination to collect samples or do other characterization including determination of areal extent for areas that are suspected of being contaminated with hazardous substances (including materials containing regulated radioactive contamination) without having to notify the LRA. As soon as the contamination is confirmed, the LRA will be notified.

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DPP COMMENT RESOLUTION

◆ WORKING GROUP –

◆ Revised 1/26/98

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Section 3 4 6 and 3 4 6 (Add new, last paragraph) *The LRA will be notified of the schedule for the readiness evaluation including but not limited to management reviews and environmental readiness evaluations and of the time and location of the initial meeting of the evaluation team designated for each decommissioning project. The LRA may designate ~~an observer~~ a participant¹ for regulatory oversight and to accompany the team and attend its meetings. It is anticipated that the ~~observer~~ participant will be the LRA project lead. A copy of the readiness evaluation team’s final report will be made available to the LRA upon request of its designated ~~observer~~ participant.*

3. Decision on notifying regulators of new, relevant procedures was that it does not need to be in the DPP. Pat Ervin will finish researching an efficient method to this and will work with CDPHE off-line.

¹ Use of the term “participant” vs “observer” is an open issue as of 1/28/98

- 4 Status After the language in item 2 is incorporated into the draft, this concern will be closed *ok*

Bullet 2. When are RFCA decisions required for decommissioning? (What's regulated under RFCA?)

- 1 Partially resolved by
 - involvement of regulators in Integrated Site Baseline and budget discussions, so they know what is scheduled and can assess prioritization, funding and other issues *L*
 - regular (biweekly for now) meetings where regulators and DOE will be informed **early** by K-H of any likely changes related to D&D prioritization and schedules
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Some activities that do not meet all these criteria may be included for information in some decision documents

- 3 Status After the language in item 2 is incorporated into the draft, this concern will be closed *ok*

Bullet 3. Hazards, threat of release and planning for mothballing buildings

- 1 Partial resolution
 - See item 1 under bullet 2
- 2 Pat Ervin revised the language as discussed in the 1/16 meeting, and Gerdeman will incorporate it into the draft DPP at 3 4 4
Add to sec 3 4 4, on RLCR
*The RLCR will be submitted to the LRA prior to "mothballing" ^{or} prior to beginning decommissioning In addition, ~~should~~ **whenever** DOE chooses to "mothball" a facility for a period ~~(including prior to completion of decommissioning)~~, DOE will submit a hazards analysis of the facility specific conditions for the mothballed period, meet with the LRA to discuss any*

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potential hazards or releases to the environment which might occur during the mothball period, devise actions to mitigate potential releases in collaboration with the LRA and propose adequate monitoring methods to monitor any release Any modification to work previously approved in a decision document would be processed in accordance with RFCA, Part 10 Changes to Work

Mothball - placing a building in a condition where it is no longer ~~requires~~ actively occupied ~~occupancy~~ Ventilation, heating and air conditioning, and fire detection and protection systems may ~~(would)~~ be turned off Sump pumps to remove groundwater infiltration may be operating

- 3 Status When the language in item 2 is incorporated into the draft, this concern will be closed *de*

Bullet 4. Building decommissioning regulatory process (issue is from the first paragraph of Attachment 1, page 3 of the 12/4/97 letter from Tarlton and Rehder to Slaten and Rampe)

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— close, will produce the document

Bullet 6 "No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary "

- 1 Status For asbestos, there was agreement that Gerdeman would find an appropriate place in the DPP to insert the following, "No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos

with needed

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with needed

abatement and/or PCB removal is utilized where necessary the site follows the requirements of the RFETS asbestos management program," *where PCBs are found, but are not rad contain, they'll be managed by TSCA.*

For PCBs, Mark Aguilar said he will check on the regulatory issues (possibly with Dan Bench) and then suggest resolution with the working group. Most of the working group would prefer addition of language similar to that for asbestos to be the closure for this issue.

If no rad, use TSCA. If there is rad

Bullet 7. Administrative and regulatory actions needed if contamination is found in a Type 1 building

- 1 Proposed wording by Ervin and Kray was further revised during the 1/16 meeting will be incorporated into the DPP by Gerdeman

3 4 5 Type 1 Building Decommissioning

Decommissioning of buildings classified as Type 1 (uncontaminated) based on an approved reconnaissance level characterization report will not require RFCA decision documents in addition to the DPP and will proceed based on standard plant operating procedures

However, if contamination is discovered during decommissioning of a building classified as Type 1, decommissioning activities in the affected areas will cease until the LRA is notified and the need to reclassify the facility is considered collaboratively

after the determination that the bldg is a Type 1

Discovery of minor spots (?) of contamination will not necessarily result in the need to reclassify a building into the Type 2 classification. If minor contamination can be removed by methods in which there is no threat of release of a hazardous substance to the environment, for example by simply cutting out a section of a panel holding a spot (?) of fixed contaminant, the building may remain as Type 1. Contamination will be cleaned up and disposed properly using existing radiological or hazardous waste management procedures

Reclassification as a Type 2 building must be considered in any instance where removal techniques involve a threat of release of a hazardous substance (as determined by the consultative process) to the environment

- 2 Status After the language in item 1 is incorporated into the draft, this concern will be closed.

Bullet 8. DOP and IM/IRA contents

- 1 Several changes were agreed to in the proposed DOP and IM/IRA table of contents and the comparison chart prepared by K-H
- 2 Status Given the incorporation of the agreed to changes, it appears this issue is close to resolution. CDPHE and EPA will review the documents in more detail and discuss their conclusions with the Working Group on 1/28/98

Free. Write agreement that ~~note~~ we have approval to take samples as necessary to confirm if ~~water~~ suspected radon

is actually present. Put into mty. minute

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For PCBs, Mark Aguilar said he will check on the regulatory issues (possibly with Dan Bench) and then suggest resolution with the working group. Most of the working group would prefer addition of language similar to that for asbestos to be the closure for this issue.

If no rad, use TSCA. If/then - OPA

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Free. Write agreement that we have approval to take samples as necessary to perform if further suspect. I would like to see action presented. Put into mty. minutes

DPP COMMENT RESOLUTION

- ◆ WORKING GROUP –
- ◆ Revised 1/22/98

The following “bullet numbers” relate to John Rampe’s 12/10/97 fax in response to the 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe. This is the status of the issues on the DPP after our discussion at the meeting on 1/16/98.

Bullet 1. Restructure the D&D process until the track record supports the development of general procedures/RSOPs and appropriate level of detail for documents required for regulator approval. From Page 1 of 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe.

1. Previously agreed
 - the level of detail for project approval has been arrived at in the B/123 PAM and the B/779 DOP
 - for significant additional information developed and submitted after initial approval of the decision document, the level of detail should be similar to that in the aforementioned documents, and the consultative process will be used for review and approval of the additional information
2. Gerdeman will add the following statement to DPP sections 3 4 6 and 3 4 7 and revise Fig 3 4 1, “Regulatory Process Flow for Building Decommissioning” to show the readiness evaluation step after the “Regulatory Approval” step (bolded language was added as agreed on 1/16)

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- 1 Partially resolved by
 - involvement of regulators in Integrated Site Baseline and budget discussions, so they know what is scheduled and can assess prioritization, funding and other issues
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Bullet 3. Hazards, threat of release and planning for mothballing buildings

- 1 Partial resolution
 - See item 1 under bullet 2
- 2 Pat Ervin will revise the language as discussed in the 1/16 meeting, and Gerdeman will incorporate it into the draft DPP to 3 4 4
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Bullet 4. Building decommissioning regulatory process (issue is from the first paragraph of Attachment 1, page 3 of the 12/4/97 letter from Tarlton and Rehder to Slaten and Rampe)

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Bullet 6 "No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary "

- 1 Status For asbestos, there was agreement that Gerdeman would find an appropriate place in the DPP to insert the following, "No further regulatory involvement for Type 1 buildings provided ~~an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary~~ **the site follows the requirements of the RFETS asbestos management program "**

For PCBs, Mark Aguilar said he will check on the regulatory issues (possibly with Dan Bench) and then suggest resolution with the working group Most of the working group would prefer addition of language similar to that for asbestos to be the closure for this issue

Bullet 7. Administrative and regulatory actions needed if contamination is found in a Type 1 building

- 1 Proposed wording by Ervin and Kray that was further revised during the 1/16 meeting will be incorporated into the DPP by Gerdeman →
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- 1 Several changes were agreed to in the proposed DOP and IM/IRA table of contents and the comparison chart prepared by K-H

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DPP COMMENT RESOLUTION
-- WORKING GROUP --

The following "bullet numbers" relate to John Rampe's 12/10/97 fax in response to the 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe. These were deemed to be the only remaining "open" issues that needed to be resolved on the DPP at the meeting on 12/11/97.

Bullet 1. Restructure the D&D process until the track record supports the development of general procedures/RSOPs and appropriate level of detail for documents required for regulator approval. From Page 1 of 12/5/97 letter from Tarlton and Rehder to Slaten and Rampe.

- 1 Previously agreed
 - the level of detail for project approval has been arrived at in the B/123 PAM and the B/779 DOP
 - for significant additional information developed and submitted after initial approval of the decision document, the level of detail should be similar to that in the aforementioned documents, and the consultative process will be used for review and approval of the additional information
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Section 3 4 6 and 3 4 6 (Add new, last paragraph) *The LRA will be notified of the schedule for the readiness evaluation and of the time and location of the initial meeting of the evaluation team designated for each decommissioning project. The LRA may designate an observer to accompany the team and attend its meetings. It is anticipated that the observer will be the LRA project lead. A copy of the readiness evaluation team's final report will be made available to the LRA upon request of its designated observer.*

- 3 See also draft language for notifying regulators of new, relevant procedures – Pat E

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- involvement of regulators in Integrated Site Baseline and budget discussions, so they know what is scheduled and can assess prioritization, funding and other issues
- regular (biweekly for now) meetings where regulators and DOE will be informed **early** by K-H of any likely changes related to D&D prioritization and schedules

2 Proposed additional action

- Add the following at the end of DPP section 1 1 3, "DOPs " (Text modified slightly from Rampe's 12/10/97 fax to Tarlton and Rehder)

IM/IRA process When a RFCA decision document is required, it will be prepared and approval received before activities are undertaken that

- 1) *pose a threat of release of hazardous substances to the environment, and*
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- Revisions to the protocol will be transmitted to the regulators per item 3 under Bullet 1

Bullet 6 "No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary "

- 1 RFFO continues to believe "that asbestos and PCB's are adequately addressed outside of RFCA, and that SOP's approved in the RFCA context are not required " (Rampe 12/10/97)
- 2 Regulators said they would check on the regulatory issues and discuss them with the working group

Bullet 7. Administrative and regulatory actions needed if contamination is found in a Type 1 building

- 1 See proposed wording by Ervin and Kray

Bullet 8 DOP and IM/IRA contents

- 1 Review proposed DOP and IM/IRA table of contents

DOP & IM/IRA Table of Contents

Executive Summary

Introduction

include purpose & scope

Building/Cluster Description

A physical description of building area, a brief operational history, including known releases and fires (based, where the information exists, on the historical release record), identification of RCRA units and CERCLA IHSSes, summary of the RLC Report findings

Alternatives Analysis & Selection

Project Approach

Description of project including a summary of project activities and controls, the relationship of the project to long-term remedial objectives and performance standards, any included RCRA closure activities, any separate environmental management or compliance approvals needed, and a description of the on-going plan for facility characterization

NOTE Prior to proceeding with decommissioning, a management review of the project's infrastructure, procedures and personnel will be completed by DOE, the LRA and the IMC, such review, to verify that the conditions exist to support the activities safely, may result in changes to the project as described in this document

Health and Safety

Include a summary of the health and safety issues

Waste Management

Include a summary of the waste management issues, including those related to disposal

Compliance w/ ARARs

Includes list of applicable laws, orders, regulations, and CWA or CAA permit requirements, Chemical-, Action- and Location Specific and To-Be-Considered Requirements and Considerations, and RFCA building cleanup criteria and standards

Environmental Consequences of the Action

Include description of environmental, socioeconomic and cumulative impacts as a result of the project to. geology and soils, air quality, water quality, human health, plants and animals, historic resources, noise levels and the local economy, mitigation measures, unavoidable adverse effects, short-term uses (?) and long-term productivity (?) and irreversible and irretrievable commitments or resources.

QA/QC

Include a summary of the quality assurance and control issues.

Implementation Schedule

Includes schedule from ISB and current planned life cycle budget.

NOTE. The schedule would be the currently planned schedule but would constitute neither an enforceable commitment nor a basis for selecting a RFCA milestone. Modifications to the schedule would not constitute a modification to the decision document requiring public review and comment or LRA approval. Also, the project budget will be at a level of detail that will not prejudice the site in procuring subcontracts for work to be done on the project.

Project Organization

includes identification of project manager, description of project team personnel, i.e., from what organizations they would come, and a description of how project fits into larger D&D effort

NOTE. This information will be supplied to add clarity to the decision document and to identify reporting relationships and responsibilities. The organizational structure is not an enforceable part of the document and DOE or its contractors may deviate from the organization without penalty and without having to notify or obtain the approval of the LRA in advance.

Comments and Comment Responsiveness Summary

References

RFCA, DPP, any RSOPs that would be used, RLC Report; where document summarizes

DPP COMMENT RESOLUTION
-- WORKING GROUP --

Bullet 1

Open
force
Open
for

- 1 Add Environmental Readiness Demonstration and Disposition Readiness Evaluation to Fig 3 4 1, Regulatory Process Flow for Building Decommissioning and a new section 3 4 7 3
- 2 Need to figure out how and when K-H and/or RFFO will do the notification High likelihood of missing notification unless it's identified in the RFFO or K-H project manager's checklist Lessons learned from the reality of 123 need to be considered in this For example, need to decide how we'll notify when DRE/ERE are done in segmented manner like 123
- 3 Need suggested language from Pat E for notifying regulators of new, relevant procedures

change to
with cost
or
go
generic
readiness
demonstration

Bullet 2

Open
Insert
Revised
in
2 3 2

- 1 Resolved by involvement of regulators in Integrated Site Baseline, so they know what's scheduled
- 2 Also, regular (biweekly for now) meetings where regulators and DOE will be informed **early** by K-H of any likely changes related to D&D
- 3 At meeting on 12/11, discussed trying to refine the definitions of "deactivation" and "decommissioning" Still need to do so? Should definition of "mothball" be the same as "deactivation?"

Bullet 3

- 1 Overall issue revolves around the still needed D&D prioritization protocol from K-H and explanation of how priority is/will be set at all levels of the WBS May need letter to K-H requesting it
- 2 See write up by Pat Ervin —proposes new language to add to 3 4 4
 - I have some significant suggested changes
 - Still need to define "mothball"
- 3 Need to decide **when** in the life of a project a RLCR and PEP are required and then put it in writing in the DPP or FDMP For decisions made that aren't in the ISB
 - Still will be issues on project by project basis of when we decide to mothball a building and how and when we let the regulators know Will this be taken care of automatically by requiring the ISB to be changed before vs after the fact?

7/1/98
DQO change
took at
1/5

DPP COMMENT RESOLUTION
-- WORKING GROUP --

Bullet 1

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- change*

Bullet 2

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- 1 Resolved by involvement of regulators in Integrated Site Baseline, so they know what's scheduled
 - 2 Also, regular (biweekly for now) meetings where regulators and DOE will be informed **early** by K-H of any likely changes related to D&D
 - 3 At meeting on 12/11, discussed trying to refine the definitions of "deactivation" and "decommissioning" Still need to do so? Should definition of "mothball" be the same as "deactivation?"

Bullet 3

- 1 Overall issue revolves around the still needed D&D prioritization protocol from K-H and explanation of how priority is/will be set at all levels of the WBS May need letter to K-H requesting it
 - 2 See write up by Pat Ervin —proposes new language to add to 3 4 4
 - I have some significant suggested changes
 - Still need to define "mothball "
 - 3 Need to decide **when** in the life of a project a RLCR and PEP are required and then put it in writing in the DPP or FDMP For decisions made that aren't in the ISB
 - Still will be issues on project by project basis of when we decide to mothball a building and how and when we let the regulators know Will this be taken care of automatically by requiring the ISB to be changed before vs after the fact?
- DQO change look at 1-5*

Will the ISB be changed enough in advance of planning and implementing mothballing activities to satisfy the State that they've had adequate time?

If the idea to allow near automatic shifting funding from landlord to D&D w/o involvement of the BCCB is adopted, what controls are in place to ensure the work is done according to a reviewed, complete PEP vs ad hoc actions by the building?

Bullet 4

- 1 Need to transmit the characterization protocol to CDPHE and EPA (They said that if the protocol is acceptable, they'll agree to "concurrence" vs "approval") Still awaiting delivery from K-H, may need letter to K-H requesting it
- 2 Still need negotiating stance by RFETS Submit the protocol for regulator approval as an RSOP or not?
- 3 Open issue Whether or not it's an RSOP, likely demand by regulators for commitment from K-H that the protocol will be used universally across the site including contractual requirement for subs and subs of subs to follow it

Bullet 5

- 1 Regulators are supposed to get back to us on regulatory issue
- 2 Found some information on TSCA vs CERCLA specific to 707 Supports doing the work in the buildings under TSCA, soils under RFCA/CERCLA

- Pat will*
- Bullet 6 *3 Should just e'g n. RFCA allows addressing PCBs, asbestos, lead etc under other laws, so we'll do so when we want*
- 1 See proposed wording by Ervin *4 What's the "lead program" issue Brook keeps discussing?*
 - Support concept, but significant problem with broadening beyond "threat of release" and other issues

Bullet 7

- 1 Review recommendations from Kassen and Shelton due 1/14 Decide on RFETS negotiating stance

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 - Would help diffuse charge that RFETS doesn't know overall process or have an overall D&D plan
 - Purpose is mentioned in DPP
 - Have many comments (internal) that would need to be incorporated if use it

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- 2 Need to ensure the agreements reached are put into the DPP or FDMP and other procedures used for D&D Who has responsibility for this? How to ensure it's done – checklist?